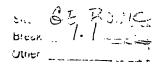


1927 LAKESIDE PARKWAY JUITE 614 JCKER, GEORGIA 30084 404-938-7710



10086138



September 10, 1987

Mr. Robert Jourdan
Site Investigation and Support Branch
Waste Management Division
Environmental Protection Agency
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Subject:

Coosa River Site RCRA Summary

TDD# F4-8707-16

Dear Mr. Jourdan:

The Coosa River Site consists of over 15 miles of surface waterways in Floyd County, Georgia. These waterways consist of a tributary of Horseleg Creek and the Coosa River from the Horseleg Creek/Coosa River confluence, down the Coosa River into Lake Weiss in Alabama. The site has received PCB- contaminated surface run-off from Rome, Georgia since 1971, and possibly many years prior to 1971. Commercial fishing on the Coosa River downstream from Rome was stopped in 1976 due to PCB contamination detected in fish from the river.

PCBs are not regulated under RCRA; however, PCBs are regulated under CERCLA provided that a release of at least 10 pounds (the "reportable quantity" for PCBs) has occurred at a site. Documentation does exist which indicates that the General Electric transformer manufacturing plant in Rome has released in excess of 10 pounds of PCB's into the site.

The site does not meet any RCRA regulatory criteria; therefore, based on the aformentioned data, the Coosa River Site should be evaluated under CERCLA authorities. A copy of the RCRA summary is enclosed.

If you have any questions regarding this matter, feel free to contact me.

Very truly yours.

Approved:

arnie Ostrobeky

Steve Walker

Geologist

SW/mb

Enclosure

RCRA Summary

Horseleg Creek and the Coosa River receive surface run-off from the General Electric Transformer Manufacturing Plant in Rome, Georgia. The facility has manufactured transformers at its present location in Rome since the 1950's. Prior to 1977, the facility manufactured transformers which contained PCB's. The facility is regulated under RCRA and has a Hazardous Waste Storage permit issued by the Georgia Environmental Protection Division (EPD) for storing waste ignitable solvents, and paint wastes (RCRA D001), waste toluene, xylene, chromium (D007) and lead (RCRA D008) - bearing paint wastes (Ref. 1). The General Electric (G.E.) facility also has a long history of discharging PCBs into a tributary of Horseleg Creek and has an NPDES permit in place for all PCB contaminated storm water/surface run-off. The PCB content of storm water/surface run-off from the G.E. plant has often exceeded limits stipulated in the NPDES permit. The G.E. Plant also discharges PCBs into the sanitary sewer leading to the Rome Waste Water Treatment Plant (Ref.2). For these reasons, and because no other large-scale handler of PCBs is known in the Rome area, the G.E. facility is believed to be the source of PCB contamination in Horseleg Creek and the Coosa River.

Since the site actually consists of a contaminated creek and receiving river, no data exists regarding any regulatory aspect of the site; Furthermore, PCBs are not regulated under RCRA.

PCBs are regulated under CERCLA and according to CFR 40 Part 302 which addresses reportable quantities of CERCLA hazardous substances, the reportable quantity of Aroclor 1254, the PCB used at the G.E. transformer facility, is 10 pounds (Ref 3). Even at NPDES - permitted levels, PCB mass loading would amount to 3.7 kg (8 .14 lb) of PCB's leaving the G.E. facility and entering the site each year (Ref. 4). Commercial Fishing on the Coosa River downstream from Rome was stopped by the Ga. Department of Natural Resources in 1976 due to PCB contamination in fish from the river.

The 68 acre. G.E. property site was paved to immobilize PCB contaminated soil. Average rainfall in the Rome area for the past 20 years was 52.83 inches/year.

Given this estimate and that all run off is discharged through storm water outfalls, the quantity of PCBs contained in the average annual runoff into the site would exceed the reportable quantity of PCBs under CERCLA in just 15 months (10.2 lbs) (Ref 4).

REFERENCES

- 1. Glass, Gwen, 1987. Environmental Scientist, Georgia Environmental Protection Division. Personal Communication with Steve Walker, Geologist, NUS Corp. Re: RCRA status of the General Electric facility. August 14, 1987.
- 2. Lester, Richard M., 1984. Environmental Manager, General Electric Company. Personal Communication with Mr. Joe Kane, Georgia Environmental Protection Division. Re: PCB levels in plant effluent. June 29, 1984.
- 3. USEPA 40 CFR, Part 302, Designation; Reportable quantities, and Notification; July 1, 1986. Pages 860,861,862,865.
- 4. Peake, Drew, 1985. Environmental Engineer, U.S. Environmental Protection Agency. Memorandum to the file. Re: Consent order No. EDD-WQ-751 with General Electric Company, Rome, Ga. June 17, 1985.

NUS CORPORATION

TELECON NOTE

CONTROL NO:	DATE:		TIME:		
		9-1-87		1420	
DISTRIBUTION: File					
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DETAILED.		05			
BETWEEN:		OF:	i	PHONE:	
Gwen Glass-Env, Specialist	/	Ga. Env. Prot. Div.		(404)656-2833	
Steve Walker-NUS Corp. #	/ 			(NUS)
DISCUSSION:					
I called Ms. Glass to i	nquire as	to the current RCRA	status	s of the General	
Electric facility in Rome, Go	eorgia.	She stated that the f	acili	ty is a TSD storage	
facility and has been issued	a draft	permit as such. The	facil	ity is permitted to	
store DOO1 (ignitable) paint	wastes,	toluene, and D007 (Ch	romiun	n bearing) and D008	
(Lead bearing) paint wastes.					
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<u> </u>					
					
ACTION ITEMS:			··· <u>·</u>		
					
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RECEIVED

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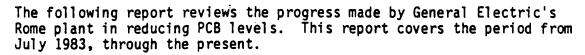
MEDIUM TRANSFORMER DEPARTMENT

GENERAL ELECTRIC COMPANY ● 1935 REDMOND CIRCLE ● ROME, GEORGIA 30161-1395 ● (404) 291-3000

June 29, 1984

Mr. Joe Kane Georgia Environmental Protection Division 270 Washington Street Atlanta, GA 30334

Dear Mr. Kane:



Identification and containment of low level residuals is the primary tool used in controlling PCB's. Layers of gravel and concrete have been placed over contaminated soil to isolate residuals from storm water runoff. The large sections of concrete slope paving have developed thermal cracks which compromise the integrity of this containment. Therefore, an elastomeric sealant, known as Sikaflex, was placed into each crack. After a crack has been thoroughly cleaned, Sikaflex will bond to the concrete and move with the slab. Approximately 9500 feet of thermal cracks have been sealed since January. The major work was centered around Discharge Points 001, 003, and 004. This abatement activity was completed in May 1984.

The gravel layers slow runoff and prevent the flushing action which could carry residual PCB's. However, the retention of storm water also encourages the growth of vegetation. Long term, unrestrained growth would be unsightly and could reduce the effectiveness of containment due to channeling. To retard such growth, long lasting herbicide pellets were placed on all gravel areas by Cook's Pest Control of Rome, Georgia. In addition, Cook's periodically spot kill any persistent growth.

Within the manufacturing area there are several equipment and utility areas located below floor level. Accumulations of water in these areas could contain oil and/or residual PCB's. Therefore, as these sumps are pumped out, the water is treated by a small physical/chemical treatment unit. The oil is accumulated and incinerated by Rollins Environmental Services of Deer Park, Texas. The contaminated sludge is shipped to Chemical Waste Management in Emelle, Alabama. In April of this year, the Transformer Test Tunnel was tied into this system. Prior to that time, the tunnel was not pumped out and the stagnant water produced a foul irritating odor and a breeding place for mosquitos.

GENERAL 3 ELECTRIC

Mr. Joe Kane June 29, 1984 Page 2

To assess the effectiveness of these abatement activities, it is essential that reliable effluent data be collected. The Rome plant is currently upgrading all five discharge monitoring stations. Each station will be modernized in appearance and function. State-of-the-art flow monitoring equipment is being used. Modern effluent samplers have been purchased. Each station will be temperature controlled to protect the sensitive electronics and reduce any calibration drift. At this time, Discharge Points 001 and 003 have been completed and work is under way on 002.

Effluent trends are tracked to provide a quick visual determination of abatement progress. The attached charts which show these trends are very encouraging. The average monthly PCB concentration continues to experience peaks and valleys. All surface discharges have remained below 10 ppb on the average for the past year. The sanitary discharge has also had an average value less than 10 ppb, but slightly above the goal of 1 ppb. These results show significant progress which will continue due to the recently completed and planned abatement activities.

If you have any questions about the PCB abatement program or other water quality parameters, please contact me.

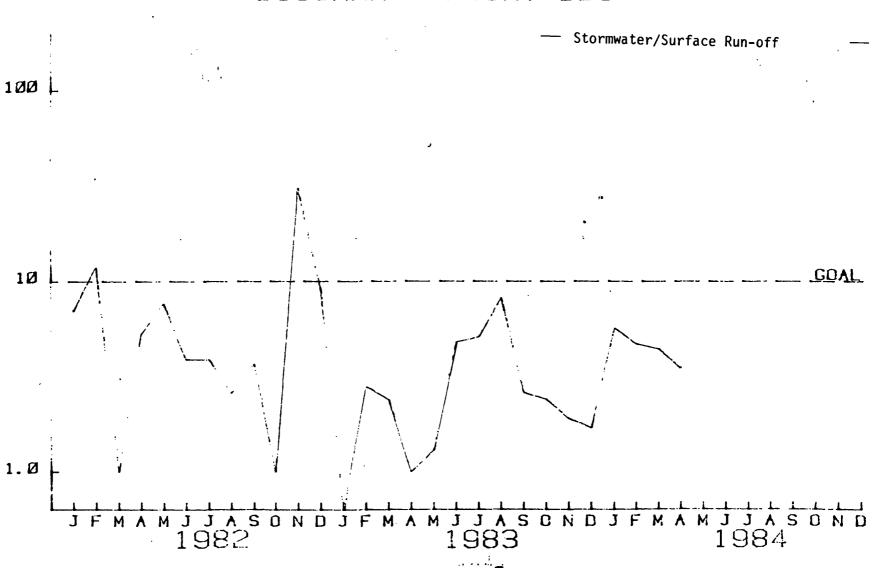
Sincerely,

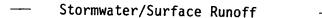
Richard Lester

Richard M. Lester Environmental Engineer

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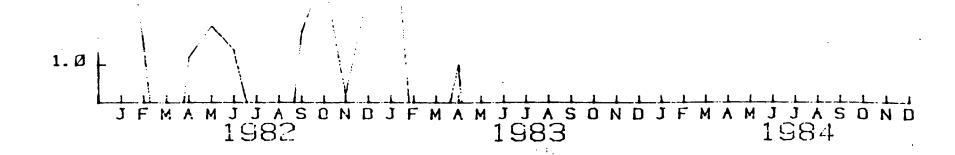
Attach.

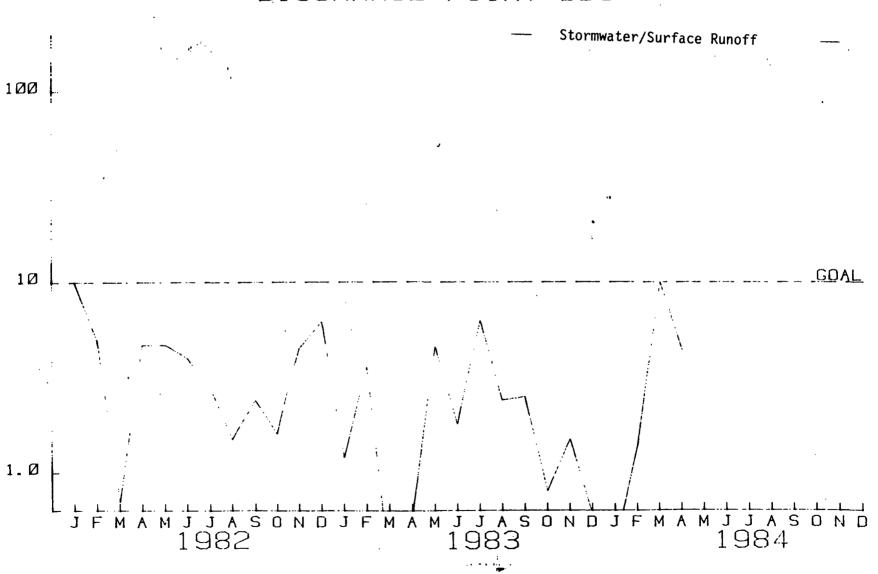


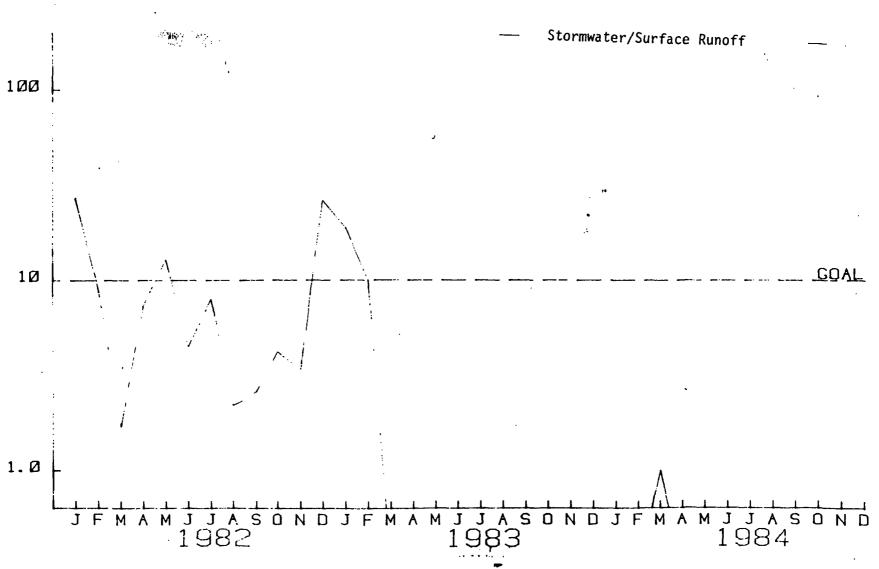


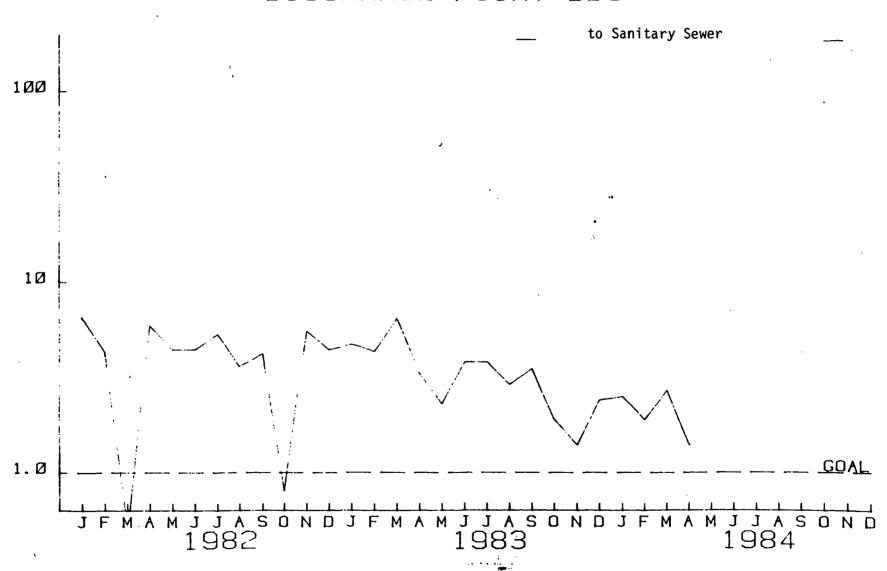
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REFERENCE NO. 3

Protection of Environment

40

PARTS 190 TO 399 Revised as of July 1, 1986



§ 302.1

3. Conditions for use: water salinity, water temperature, types and ages of pollutants.

VII(a). Toxicity (Dispersants and Surface Collecting Agents):

Materials tested	Species	LC50 (ppm)
Product	Fundulus heterocitius Artemis salins	
No. 2 fuel oil	Fundulus heterocitus Artemis salins	
Product and No. 2 fuel oil (1:10).	Fundulus heterocitus Artemis salins	— 98-ly. — 48-ly.

VII(b). Effective (Dispersants):

STANDARD EFFECTIVENESS TEST WITH No. 6 FUEL OIL

Volume (ml) dispersant	Initial (10 min) mean percent dispersion	Final (2 hrs) mean percent dispersion
3		
25		

Dosage causing 50 percent dispersion (from initial dispersion graph) is —ml.

Dosage causing 25 percent dispersion

(from initial dispersion graph) is

VIII. Microbiological Analysis (Biological Additives).

IX. Physical Properties of Dispersant/Surface Collecting Agent:

- 1. Flash Point: (°F)
- 2. Pour Point: (°F).
- 3. Viscosity:--'F (furol seconds). --at-
- 4. Specific Gravity:-_at___'F.
- 5. pH: (10 percent solution if hydrocarbon based).
 - 6. Surface Active Agents (Dispersants).
 - 7. Solvents (Dispersants):1
- 8. Additives (Dispersants);
- 9. Solubility (Surface Collecting Agents): X. Analysis for Heavy Metals and Chlorin-

ated Hydrocarbons (Dispersants and Surface Collecting Agents):

Compounds	Concentration (ppm)
Arsenic	
Sadmium	
Chromium	
Copper	

'If the submitter claims that the information presented under this subheading is confidential, this information should be submitted on a separate sheet of paper clearly labeled according to the subheading and entilled "Confidential Information."

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Compounds	Concentration (ppm)			
Leed				
Mercury				
Wickel				
Zine	1			
Cyenide				
Chlorinated Hydrocarbons	•			

REFERENCES

(1) L.T. McCarthy, Jr., I. Wilder, and J.S. Dorrier. Standard Dispersant Effectiveness and Toxicity Tests. EPA Report EPA-R2-73-201 (May 1973).

(2) R.T. Rewick, H.C. Bailey, and J.H. Smith. Evaluation of Oil Spill Dispersant Testing Requirements, draft report submitted in partial fulfillment of EPA Contract No. 68-03-2621. U.S. Environmental Protection Agency, Oil and Hasardous Materials Spills Branch, Edison, New Jersey (September 1982).

(3) R.T. Rewick, K.A. Sabo, J. Gates, J.H. Smith, and L.T. McCarthy, Jr. "An Evalua-tion of Oil Spill Dispersant Testing Requirementa." Proceedings, 1981 Oil Spill Conference, Publication No. 4334. American Petroleum Institute, 1220 L Street, NW., Washington, DC 20005 (1981).

[49 FR 29199, July 18, 1984]

PART 302-DESIGNATION, REPORT-ABLE QUANTITIES, AND NOTIFICA-TION

- 302.1 Applicability.
- 302.2 Abbreviations.
- Definitions. 802.3
- 302.4 Designation of hazardous substances. 302.5 Determination of reportable
- quantities.
 302.6 Notification requirements.

302.7 Penalties.

AUTHORITY: Sec. 102 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9602; secs. 311 and 501(a) of the Federal Water Pollution Control Act, 33 U.S.C. 1321 and 1361.

Source: 50 FR 13474, Apr. 4, 1985, unless otherwise noted.

§ 302.1 Applicability.

This regulation designates under section 102(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("the Act") those substances in the statutes referred to in section 101(14) of the Act, identifies reportable quantities

Environmental Protection Agency

for these substances, and sets forth the notification requirements for releases of these substances. This regulation also sets forth reportable quantities for hazardous substances designated under section 311(b)(2)(A) of the Clean Water Act.

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§ 302.2 Abbreviations.

CASRN = Chemical Abstracts Service Regis-RCRA-Resource Conservation and Recovtry Number ery Act of 1976, as amended lb=pound kg=kilogram RQ=reportable quantity

§ 302.3 Definitions.

As used in this part, all terms shall have the meaning set forth below:

"The Act", "CERCLA", or "Superfund" means the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Pub. L. 96-510);

"Administrator" means the Administrator of the United States Environmental Protection Agency ("EPA");

"Consumer product" shall have the meaning stated in 15 U.S.C. 2052;

"Environment" means (1) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Fishery Conservation and Management Act of 1976, and (2) any other surface water, ground water, drinking water supply, land surface or subsurface or ambient air within the strata. United States or under the jurisdiction of the United States;

'Facility" means (1) any building, installation, equipment, structure. pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (2) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel;

'Hazardous substance" means any substance designated pursuant to 40

CFR Part 302;

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Compounds	Concentration (ppm)
Leed	
Mercury	•
Nickel	
Zinc	
Cyanide	
Chlorinated Hydrocarbons	

REFERENCES

(1) L.T. McCarthy, Jr., I. Wilder, and J.S. Dorrier. Standard Dispersant Effectiveness and Toricity Tests. EPA Report EPA-R2. 73-201 (May 1973).

(2) R.T. Rewick, H.C. Bailey, and J.H. Smith. Evaluation of Oil Spill Dispersant Testing Requirements, draft report submit. ted in partial fulfillment of EPA Contract No. 68-03-2621. U.S. Environmental Protec. tion Agency, Oil and Hazardous Materials Spills Branch, Edison, New Jersey (Septem. ber 1982).

(3) R.T. Rewick, K.A. Sabo, J. Gates, J.R. Smith, and L.T. McCarthy, Jr. "An Evaluation of Oil Spill Dispersant Testing Require. ments." Proceedings, 1981 Oil Spill Conference, Publication No. 4334. American Petro-leum Institute, 1220 L Street, NW., Washington, DC 20005 (1981).

[49 FR 29199, July 18, 1984]

PART 302-DESIGNATION, REPORT-ABLE QUANTITIES, AND NOTIFICA-TION

Sec.

302.1 Applicability. 302.2 Abbreviations. 302.3 Definitions.

302.4 Designation of hazardous substances. 302.5 Determination of reportable quantities.

302.6 Notification requirements.

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Source: 50 FR 13474, Apr. 4, 1985, unless otherwise noted.

§ 302.1 Applicability.

This regulation designates under section 102(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("the Act") those substances in the statutes referred to in section 101(14) of the Act, identifies reportable quantities

Environmental Protection Agency

for these substances, and sets forth the notification requirements for releases of these substances. This regulation also sets forth reportable quantities for hazardous substances designated under section 311(b)(2)(A) of the Clean Water Act.

\$ 302.2 Abbreviations.

CASRN = Chemical Abstracts Service Registry Number

RCRA-Resource Conservation and Recovery Act of 1976, as amended

lb=pound kg=kilogram

RQ=reportable quantity

§ 302.3 Definitions.

As used in this part, all terms shall have the meaning set forth below:

"The Act", "CERCLA", or "Superfund" means the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (Pub. L. 96-510);

"Administrator" means the Administrator of the United States Environmental Protection Agency ("EPA");

"Consumer product" shall have the meaning stated in 15 U.S.C. 2052;

"Environment" means (1) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Fishery Conservation and Management Act of 1976, and (2) any other surface water, ground water, drinking water supply, land surface or subsurface or ambient air within the United States or under the jurisdiction of the United States:

"Facility" means (1) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (2) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located: but does not include any consumer product in consumer use or any vessel:

"Hazardous substance" means any substance designated pursuant to 40 CFR Part 302:

"Hazardous waste" shall have the meaning provided in 40 CFR 261.3:

"Navigable waters" or "navigable waters of the United States means waters of the United States, including the territorial seas;

"Offshore facility" means any facility of any kind located in, on, or under, any of the navigable waters of the United States, and any facility of any kind which is subject to the jurisdiction of the United States and is located in, on, or under any other waters, other than a vessel or a public vessel:

'Onshore facility" means any facility (including, but not limited to, motor vehicles and rolling stock) of any kind located in, on, or under, any land or non-navigable waters within the United States:

"Person" means an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body:

"Release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, but excludes (1) any release which results in exposure to persons solely within a workplace. with respect to a claim which such persons may assert against the employer of such persons, (2) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (3) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954, if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 170 of such Act, or for the purposes of section 104 of the Comprehensive Environmental Response, Compensation, and Liability Act or any other response action, any release of source, byproduct, or special nuclear material from any processing site designated under section 102(a)(1) or 302(a) of the Uranium Mill Tailings Radiation Control Act of 1978, and (4) the normal application of fertilizer;

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"Reportable quantity" means that quantity, as set forth in this part, the release of which requires notification pursuant to this part;

"United States" include the several States of the United States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the United States Virgin Islands, the Commonwealth of the Northern Marianas, and any other territory or possession over which the United States has jurisdiction; and

"Vessel" means every description of watercraft or other artificial contrivance used, or capable of being used, as a means of transportation on water.

§ 302.4 Designation of hazardous substances

(a) Listed hazardous substances. The elements and compounds and hazardous wastes appearing in Table 302.4 are designated as hazardous substances under section 102(a) of the

(b) Unlisted hazardous substances. A solid waste, as defined in 40 CFR 261.2, which is not excluded from regulation as a hazardous waste under 40 CFR 261.4(b), is a hazardous substance under section 101(14) of the Act if it exhibits any of the characteristics identified in 40 CFR 261.20 through

Note: The numbers under the column headed "CASRN" are the Chemical Abstracts Service Registry Numbers for each hazardous substance. Other names by which each hazardous substance is identified in other statutes and their implementing regulations are provided in the "Regulatory Synonyms" column. The "Statutory RQ" column lists the RQs for hazardus substances established by section 102 of CERCLA. The "Statutory Code" column indiates the statutory source for designating each substance as a CERCLA hazardous substance: "1" indicates that the statutory source is section 311(b)(4) of the Clean Water Act. "2" indicates that the source is section 307(a) of the Clean Water Act, "3" indicates that the source is section 112 of the Clean Air Act, and "4" indicates that the source is RCRA section 3001. The "RCRA Waste Number" column provides the waste identification numbers as-3001. The "RCRA Waste Number" column provides the waste identification numbers assigned to various substances by RCRA regulations. The column headed "Category" lists the code letters "X," "A," "B," "C," and "D," which are associated with reportable quantities of 1, 10, 100, 1000, and 5000 pounds, respectively. The "Pounds (kg)" column provides the reportable quantity for each hazardous substance in pounds and kilograms.

TABLE 302.4—LIST OF HAZARDOUS SUBSTANCES AND REPORTABLE QUANTITIES

[See footnotes at end of Table 302.4]

į			Statutory			F	Finel RQ	
Hazardous Substance	CASRN	Regulatory Synonyms	RQ	Code† RCRA Waste Number	Catego- ry	Pounds(Kg)		
Aconaphthene	83329		1*	2		x	1## (0.454)	
Acenephthylene	206968	***************************************	1*	2		x	1## (0.454)	
Acetaldehyde	75070	Ethernel	1000	1.4	U001	С	1000 (454)	
Acetaldehyde, chloro	107200	Chloroecetaidehyde	1"	4	P023	С	1000 (454)	
Acetaldehyde, trichloro	75876	Chiorai	1*	4	U034	x	1#(0.454)	
Acetamide, N- (aminothioxomethyl)	591062	1-Acetyl-2-thicures	1.	4	P002	С	1000 (454)	
Acetamide, N-(4- ethoxyphenyl)	62442	Phenacetin	1*	4	U187	x	1# (0.454)	
Acetemide, N-9H- fluoren-2-yl	53963	2-Acetylaminofluorene	1*	4	U005	x	1# (0.454)	
Acetamide, 2-fluoro	640197	Fluoroacetamide	1*	4	P057	8	100(45.4)	
etic acid	64197		1000	1		D	5000 (2270)	

Environmental Protection Agency

TABLE 302.4—LIST OF HAZARDOUS SUBSTANC: Continued

		1	See tootnotes at end	of T
Hazardous Substance	CASRN	Reg	ulatory Synonyma	_ F
Acetic acid, ethyl ester	141786	Ethyl	scripto	1
Acetic acid, fluoro sodium salt.	62748	Fluor	oecetic acid, dium self.	٦
Acetic acid, lead salt	301042		ecetate	50
Acetic acid. thatflum(I) selt.	583688	The	ium(I) scetate	
Acetic anhydride	108247			10
Acetimidic acid,N- [(methylcarbemoyl) oxy]thio-, methyl ester.	16752775	Met	h ornyl	
Acetone	67641	2-P1	торелопе	
Acetone cyanohydrin	75865	Pro	ethytlactonitrile penenitrile, 2- ydroxy-2-methyl-	
Acetonitrile	75058	Eth	enenitrile	1
3-(alphe- Aostonylbenzyl)- 4- hydroxycoumarin and salts.	81812	2 Wa	rterin	
Acetophenone	9886	2 E0	nenone, 1-phenyl-,	1
2-Acetyleminofluorene	5396	3 40	etamide, N-9H- Nuoren-2-yl	
Acetyl bromide	50696	1	.,	" '
Acetyl chloride	7536	- 1	henoyi chloride	-
1-Acetyl-2-thioures	5910£	12 4	peternide, N- (aminothioxomethyl)	
Acrolein	1070	_ _	Propensi	
Acrylamide	790	`\	Propenamide	
Acrylic acid	791	` \	Propencic acid	
Acrylonitrile	1071		-Propenenitrile	
Adipic acid	1240	ì		
Alanine, 3-(p-bis(2- chloroethyl)amino] phenyl-,L	1488		Aetphalan	
Aldicarts	1164	063	Propanal, 2-methyl-2- (methylthio)-, O- ((methylamino) carbonyl)oxime.	

SUBSTANCES AND REPORTABLE QUANTITIES—

Continued

tes at end of Table 302.4]

		Statutory		F	inal RO
o.,	RQ	Codet	RCRA Waste Number	Catego- ry	Pounds(Kg)
	1	1,2,4	P004	×	1# (0.454)
:5,8-					
ithalene.					
	100	1,4	P005	9	100 (45.4)
	1000	1		С	1000 (454)
	1*	4	P006	9	100 (45.4)
***************************************	5000	1		٥	5000 (2270)
e, 5-	1*	4	P007	С	1000 (454)
	1*	4	P006	С	1000 (454)
3-amine	1*	4	U011	x	1# (0.454)
	100	1		В	100## (45.4)
	5000	1		D	[*] 5000 (2270)
	5000	1		D	5000 (2270)
	5000	1		D	5000 (2270)
	1000	1		С	1000# (454)
	5000	1		D	5000## (2270)
	5000	1		D	5000 (2270)
	5000	1		٥	5000 (2270)
	5000	1		, D	5000 (2270)
	5000	1		D	5000 (2270)
	1000	1	***************************************	С	1000# (454)
	5000	1		D	5000 (2270)
	5000	1		D	5000 (2270)
	5000	1	•••••	В	100 (45.4)
	1000	1		С	1000 (454)
	5000	1		D	5000 (2270)
titro-, IL	1.	4	P009	A	10 (4.54)
	1000	1		С	1000 (454)

5000 (2270)

Environmental Protection Agency

TABLE 302.4—LIST OF HAZARDOUS SUBSTANCES AND REPORTABLE QUANTITIES—Continued

(See footnotes at end of Table 302.4)

				Statutory		Final RQ		
Hazardous Substance	CASRN	Regulatory Synonyms	RQ	Codet	RCRA Weste Number	Catego- ry	Pounds(Kg)	
Ammonium sulfide	12135761		5000	1		В	100 (45.4)	
ummonium suifite	10196040		5000	1		Ð	5000 (2270)	
ummonium tartrate	14307438 3164292		5000	1		D	5000 (2270)	
unmonium thiocysnate	1762954		5000	1	••••••	D	5000 (2270)	
mmonium thiosulfate	7783188		5000	,		9	5000 (2270)	
mmonium vanadate	7803556	Vanadic acid, ammonium salt.	1*	4	P119	С	1000 (454)	
unyl acetateiso-	626637 123922 626380	***************************************	1000	1	ļ	D	5000 (2270)	
sec- tert-	625161					İ		
niine	62533	Benzenemine	1000	1,4	U012	D	5000 (2270)	
vithracene	120127	***************************************	1*	2		×	1## (0.454)	
ntimony ††	7440360		1*	2	ļ <u>.</u>	×	1## (0.454)	
NTIMONY AND COMPOUNDS.			1*	2	<u> </u>		••	
untimony pentachloride	7647189	***************************************	1000	1	·····	C.	1000 (454)	
ntmony potassium tartrata.	28300745		1000	1	 	В	100 (45.4)	
untimony tribromide	7789619	***************************************	1000	1		С	1000 (454)	
ntimony trichloride	10025919	·····	1000	1		С	1000(454)	
ntimony trifluoride	7783564		1000	1		С	1000 (454)	
ntimony trioxide	1309644	•••••••••••••••••••••••••••••••••••••••	5000	1		С	1000 (454)	
vocior 1016	12674112	Polychlorineted Biphenyls (PCBe).	10	1,2)	^	10# (4.54)	
Vocior 1221	11104282	Polychloringted Biphenyls (PCBs).	10	1,2		^	10# (4.54)	
Vocior 1232	11141165	Polychlorineted Biphenyls (PCBe).	10	1,2	······································	^	10# (4.54)	
vocior 1242	53469219	PolychlorinstedBiphenyls (PCBe).	10	1,2		^	10# (4.54)	
vocior 1248	12672298	Polychiorinated Biphenyls (PCBs).	10	1,2		^	10# (4.54)	
vocior 1254	11097691	Polychlorinated Biphenyls (PCBs).	10	1,2		^	10# (4.54)	
Vocior 1260	11096825	Polychlorineted Biphenyls (PCBs).	10	1,2		٨	10# (4.54)	
Vrsenic ††	7440382		1.	2,3		x	1#(0.454)	

UNITED S, ATES ENVIRONMENTAL

DATE: JUN 17 1985

SUBJECT: Consent Order No. EPD-WQ-751 (dtd 04 JAN 84) with General Electric Company, Rome, GA.

AL/GA Unit, F.P.B., WMD

TO FILES

BACKGROUND

Director of the Georgia Environmental Protection Division (EPD) executed NPDES Permit No. GA0024155 on March 7, 1977 for the General Electric (G.E.) Medium Transformer Plant in Rome, Georgia. This permit was reissued on December 30, 1985, to expire on December 5, 1987. G.E. is listed as a major industrial. The following Orders are referenced in EPD-WQ-751: EPD-WQ-370 (dated 07 OCT 77), EPD-WQ-406 (dated 14 NOV 78), EPD-WQ-416 (dated 18 JUL 79), and EPD-WQ-487 (dated 30 AUG 81). The permit was reissued on December 30, 1982. The current permit limits polychlorinated biphenals to 0.01 mg/l (daily max), and oil & grease to 10 mg/l and 15 mg/l (daily average and daily max) at outfalls 001 through 004. Storm runoff accounts for all the discharge from outfalls 001, 002, and 003. Groundwater seepage, storm runoff and overflow from the spray pond combine to form outfall 004. During dry weather the only discharge from outfalls 001-004 is that from groundwater seepage and the spray pond to 004. Sanitary wastes are discharged to the municipal wastewater treatment plant through outfall 005.

In 1977, G.E. agreed to provide \$506,082 to the City of Rome to resolve a continuing problem with PCB contaminated sludge. That money was to install a chemical treatment system and construct a holding tank (\$363,882), and to help defray the operating and maintenance expense for three years (\$142,200). G.E. also agreed to remove 3.3 million gallons of PCB contaminated sludge that had accumulated at the Rome Sewage Treatment Plant.

It has been reported that the entire 68 acre site was paved to immobilize the PCB contaminated soil. If it is assumed that all the precipitation that falls on the site is discharged through outfalls 001 - 004 with PCB concentrations at the permitted limits, the mass loading would be about 3.7 kg per year of PCBs. The average annual precipitation in Rome for the 20 years ending in 1980 was 52.83 in/yr. Severe storms of any type are infrequent. The most frequent misfortune resulting from weather in this vicinity in the past has been floods on the rivers. The permit identifies the receiving waters as "unnamed tributaries to Horseleg Creek and unnamed tributaries of Little Dry Creek, both tributaries to Coosa River". Flooding, groundwater seepage and spray pond overflow could increase the total mass loading of PCBs considerably.

In 1977, EPA policy established zero discharge limits for PCBs for certain industrial source under 307(c). However, in 1977, there was a discussion between G.E. and EPD that 42 FR 6550 declassified the plant from the definition "electrical transformer plant" and therefore NPDES limits under Section 307(a) were not applicable. That discussion has no bearing on water quality based standards. EPA's position on the discharge of PCB's into the water is discussed in the attached April 29, 1985, memo on Fort Howard Paper Company (Pages 3-5).

The EPA instream criterion for PCBs at the 10^{-6} risk level is 0.079 ng/l (0.000000079 mg/l). A 3.7 kg/year mass loading, diluted by the average flow of the Coosa River (6773 cfs), would result in a concentration of 0.621 ng/l. That concentration approaches the 10^{-5} risk level of 0.79 ng/l.

The permit incorrectly states "For storm runoff detectable limits are defined by the Georgia Environmental Protection Division and the U.S. Environmental Protection Agency as 10 parts per billion (micrograms/liter)". In 1976, the detectable limit was 1 ppb (0.001 mg/l). Now the detectable limit is 0.065 ppb (0.000065 mg/l). The permit requires annual progress reports until a level of 0.001 mg/l in dry weather flow and 0.01 mg/l in all wet weather flow is achieved. Discharge limit for outfall 005, to the City of Rome's sewerage system, was set at below detectable limits (defined in the permit on page 14 as 1 ppb). Rome POTW monitors influent and has indicated that the concentration of PCBs coming into the plant "is almost always less than 1 ppb." The permit requires G.E. to monitor PCBs and flow at 005 on a daily basis. Monitoring reports must also include amount of rainfall on a daily basis. G.E. is required to collect information required to determine rainfall intensity and duration. The Consent Order (EPD-WO-751) requires upgrading NPDES monitoring instrumentation to include state-of-the-art equipment and samplers according to the following schedule: April '84 - 001; October '84 - 002; July '84 - 003; January '85 004; and, July '85 - 005.

The G.E. plant has interim status to store hazardous wastes. On October 27, 1982, G.E. revised their RCRA Form 3 to de-list PCBs, asbestos, paint, and waste oil because these are not regulated as hazardous wastes. Their RCRA Form 3 now lists the following: 3000 lbs. ethylene dichloride and/or formic acid; 2000 lbs ethene, 1,1,2,2-tetrachloro; 50 lbs benzene, methyl; 1000 lbs benzene, dimethyl (I,T). Part B of their application was due to Georgia in January 1985.

In 1976 the State banned commercial fishing on the Coosa because of dangerous levels of PCBs that were found in the fatty tissue of fish taken from that river. The source of PCBs was believed to be the G.E. plant. Gene Welsh responded to a recent report (attached) of toxic waste contamination in the Coosa, Etowah and Oostanaula Rivers with "... The report is far from factual. listed the problems of years ago, and not what has been done to correct it." (Atlanta Constitution 4/8/85). In the same article, Gene Welsh reported "...the last reading on fish taken from the Coosa last June showed a PCB range of zero to 15 parts per million in bottom fish and zero or near zero in sport fish such as bass". The acceptable federal level was lowered from 5 to 2 parts per million last year. When we requested recent data on PCB levels in fish taken from the Coesa from Mike Jennings of the Georgia Fish and Game Division, we were advised that we would have to go through Gene Welsh to obtain that data. There is no PCB data in STORET for the Coosa and EPD does not have a report on this issue. The Environmental Defense Fund report is attached. The Report's author, Mary Beth Zimmerman, National Governors Association identified Mike Jennings as the source of their data.

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The Consent Order at hand (EPD-WQ-751) does not appear to require the kind of control measures that will lead to meeting the permit standards. The most significant measures seem to be a schedule of meetings and reports of progress towards meeting the permit limits. It would be difficult, with the information at hand, to develop an argument that the state was pursuing diligent prosecution in this case. A second problem is that if they could meet the permit limits, those limits do not insure compliance with EPA's water quality criteria for protection of human health (carcinogen) or wildlife reproduction.

PROBLEM

We may not have sufficient information in hand to respond to reasonable inquiries concerning our oversight of this permit. There is no compliance file available in the Regional Office and the EPA permit file only contains the permit. There is no information in the measurements and violations data field of the PCS and the inspection data field indicates no inspections between October 1980 and January 1985. The information that has been gathered for this summary was found piecemeal and includes sources such as general library references, Environmental Defense Fund, local newspaper, and files maintained by personnel in other program offices.

RECOMMENDATION

I think we should ask GA EPD for copies of the previous Orders, any other correspondence or information they have on compliance, and a copy of the permit file, including the application. If Georgia has recent data on PCBs in aquatic organisms and sediments in the Coosa, we should look at it; if not, we should make some attempt to gather such data. If that information is unavailable or insufficient, we may want to attend the July 15, 1985 meeting between Georgia EPD and G.E. that was set in the Consent Order to "discuss PCB effluent trends". PCS should be updated for this source.

cc: Lee Tebo, Jr., ESD